

# Tacopina Seigel Trial Lawyers

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December 18, 2023

Hon. Nicholas G. Garaufis  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: United States v. Steven Molinaro**  
**Indictment No. 22-cr-00382 (NGG)**

Your Honor:

The defense respectfully submits this letter, on behalf of defendant Steven Molinaro, to request – with the consent of the Government – that Mr. Molinaro's bail conditions be temporarily modified in order to permit him to spend Christmas Day with his family.

By way of background, Mr. Molinaro, who is scheduled to be sentenced on January 31, 2024, was released on December 20, 2022, on a \$5 million personal recognizance bond, executed by three sureties and secured by three properties comprising approximately \$2.4 million in equity. Additionally, as a condition of his release, Mr. Molinaro was subjected to home detention with electronic monitoring.

Accordingly, we now ask that Mr. Molinaro's condition of home detention be temporarily lifted, in order to permit him to travel to the neighboring home of his grandfather, James Molinaro, this coming Monday, December 25, 2023, so that he may spend the Christmas holiday with him and his other family members.

Notably, the defense has conferred with the Assistant U.S. Attorney Nina Gupta, who consents to this application on behalf of the Government. Additionally, we have been advised that Pretrial consents to this request as well.

Your consideration in this matter is greatly appreciated.

Respectfully submitted,



Chad D. Seigel

cc: AUSA Nina Gupta